

JASON M. FRIERSON, NVSBN 7709
United States Attorney
District of Nevada

DAVID PRIDDY, ILSBN 6313767
Special Assistant United States Attorney
6401 Security Boulevard
Baltimore, MD 21235
Telephone: (510) 970-4801
Facsimile: (415) 744-0134
E-Mail: David.Priddy@ssa.gov

Attorneys for Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

RIMMA ROSE ALEJANDRO,

Plaintiff,

v.

KILOLO KIJAKAZI,
Commissioner of Social Security,

Defendant.

Case No.: 2:22-cv-01752-VCF

**UNOPPOSED MOTION FOR
EXTENSION OF TIME
(FIRST REQUEST)**

Defendant, Kilolo Kijakazi, Acting Commissioner of Social Security (Defendant) respectfully requests that the Court extend the time for Defendant to respond to Plaintiff's Motion for Reversal and/or Remand (Dkt. No. 16, filed on March 7, 2023), currently due on April 6, 2023, by 32 days, through and including May 8, 2023. Defendant further requests that all subsequent deadlines be extended accordingly.

This is Defendant's first request for an extension of time to file a response. Good cause exists for this extension. Defendant respectfully requests this additional time because counsel is currently in the process of determining if a settlement agreement is possible. If the case cannot be settled, then Defendant's counsel will proceed with filing Defendant's response to Plaintiff's Motion for Reversal

1 and/or Remand. This request is made in good faith and with no intention to unduly delay the
2 proceedings.

3 On April 6, 2023, counsel for Defendant conferred with Plaintiff's counsel, who has no
4 opposition to this motion.

5 It is therefore requested that Defendant be granted an extension of time to respond to Plaintiff's
6 Motion for Reversal and/or Remand, through and including May 8, 2023.

7
8 Dated: April 6, 2023

Respectfully submitted,

9 JASON M. FRIERSON
10 United States Attorney

11 /s/ David Priddy
12 DAVID PRIDDY
13 Special Assistant United States Attorney

14
15 IT IS SO ORDERED:

16 
17 UNITED STATES MAGISTRATE JUDGE

18 4-6-2023

19 DATED: _____
20
21
22
23
24
25
26

CERTIFICATE OF SERVICE

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 6401 Security Boulevard, Baltimore, Maryland 21235. I am not a party to the above-entitled action. On the date set forth below, I caused service of **UNOPPOSED MOTION FOR EXTENSION OF TIME (FIRST REQUEST)** on the following parties by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which provides electronic notice of the filing:

Leonard Stone
Shook & Stone, Chtd.
710 S Fourth Street
Las Vegas, NV 89101
702-385-2220
Email: lstone@shookandstone.com

Marc V. Kalagian
Law Offices of Lawrence D. Rohlfing, Inc., CPC
12631 East Imperial Highway
Suite C115
Santa Fe Springs, CA 90670
562-273-3702
Fax: 562-868-5491
Email: marc.kalagian@rksslaw.com

Attorney for Plaintiff

Dated: April 6, 2023

/s/ David Priddy
DAVID PRIDDY
Special Assistant United States Attorney